

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

| | | |
|--------------------------|---|-------------------------------|
| DALLAS BUYERS CLUB, LLC, |) | |
| |) | Case No.: 14-cv-2156 |
| Plaintiff, |) | |
| |) | Judge Matthew F. Kennelly |
| v. |) | |
| |) | Magistrate Judge Maria Valdez |
| DOES 1 – 41, |) | |
| |) | |
| Defendants. |) | |

MOTION FOR LEAVE TO TAKE DISCOVERY
PRIOR TO RULE 26(f) CONFERENCE

Plaintiff, by and through undersigned counsel, pursuant to the Federal Rules of Civil Procedure, respectfully moves this Court for leave to take limited discovery prior to the Rule 26(f) conference for the reasons stated in its accompanying Memorandum and Declaration filed concurrently herewith. Plaintiff requests a hearing on this matter, if necessary, in accordance with the accompanying notice.

In particular, Plaintiff seeks the issuance of subpoenas under Rule 45 to the Internet Service Providers (“ISPs”) who provided internet services to any of the Doe Defendants identified by an Internet Protocol (“IP”) address in Exhibit C of the Complaint to obtain information sufficient to identify each Doe Defendant by name and current address.

Dated: April 7, 2014

Respectfully submitted,

By: s/ Michael A. Hierl
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Dallas Buyers Club, LLC

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true and correct copy of the foregoing Motion for Leave to Take Discovery Prior to Rule 26(f) Conference was filed electronically with the Clerk of the Court and served on all counsel of record and interested parties via the CM/ECF system on April 7, 2014.

s/Michael A. Hierl